



U.S. Department of Justice

United States Attorney
Southern District of New York

November 12, 2021

United States District Courthouse
300 Quarropas Street
White Plains, New York 10601

November 12, 2021

BY EMAIL & ECF

The Honorable Vincent Briccetti
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

**APPLICATION GRANTED
SO ORDERED:**

Vincent L. Briccetti, U.S.D.J.

Dated: November 12, 2021
White Plains, NY

Re: United States v. Frank Brown, a/k/a "Nitty," et al., S1 20 Cr. 444 (VB)

Dear Judge Briccetti:


The Government respectfully writes regarding defendant Frank Brown's suppression motion dated August 25, 2021. (See Docket Entries 113-17). The Government's current deadline to respond to the motion is November 12, 2021.

The Government is still in active plea negotiations with Mr. Gold, counsel to Mr. Brown, and the parties are hopeful that they will be able to reach a resolution of this matter in the coming weeks. Mr. Gold discussed a potential resolution with Mr. Brown this week and asked that the Government prepare a plea offer. Accordingly, the Government respectfully requests an additional two weeks—until November 26, 2021—to respond to the defendant's motion.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by:


Benjamin A. Gianforti
Assistant United States Attorney
(646) 856-5190

cc: Ben Gold, Esq., counsel to Frank Brown (by ECF & email)
Larry Sheehan, Esq., counsel to Pedro Rainey (by ECF & email)
Daniel Parker, Esq., counsel to Joseph Scott (by ECF & email)
Frank O'Reilly, Esq., counsel to Tonya Brown (by ECF & email)
Sam Braverman, Esq., counsel to Keith Glover (by ECF & email)